

January 20, 2022

U.S. Department of Transportation, Docket Operations
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Amendment to Exemption No 18977 Docket No FAA-2021-0921

A. SUMMARY

On September 29, 2021 Kona Drone Service LLC, an agricultural services company and pursuant to Title 49 U.S.C. § 44807, Special authority for certain unmanned aircraft systems and 14 C.F.R. Part 11, requested a petition for Exemption for the purpose of operating the DJI Agras T16 unmanned aircraft systems ("UAS") weighing over 55 pounds but no more than 97.2 pounds, for vegetation control for agricultural applications. On December 21, 2021 Kona Drone Service was granted approval under exemption No 18977

Kona Drone Service (KDS) requests to modify their exemption immediately to add the language seeking relief from condition and limitation number 27c. Kona Drone Service has already submitted a confidential safety case under separate cover.

The DJI Agras T16 is already approved by both the FAA and the Office of Secretary of Transportation. The proposed operations in this amended Petition are very similar in nature to those currently conducted by Advanced Cleanup Technologies, approved Exemption No. 18869, and are therefore considered a summary grant. With this request, Kona Drone Service will continue to comply with the same current conditions and limitations as directed by the FAA.

Kona Drone Service seeks relief from the conditions and limitations of number 27c.

Number 27c states that:

27. All flight operations must be conducted at least 500 feet from all persons who are not directly participating in the operation, and from vessels, vehicles, and structures, unless when operating:

c. Near vessels vehicles and structures. Prior to conducting operations, the operator must obtain permission from a person with the legal authority over any vessels, vehicles or structures that will be within 500 feet of the UA during operations. The PIC must make a safety assessment of the risk of operating closer to those objects and determine that it does not present an undue hazard.

It is the vehicle language within 27c that Kona Drone Service seeks relief from. It is completely unrealistic and impractical during routine crop spraying operations at low altitudes to stop each moving vehicle that could potentially be traveling a road along the field to seek permission to fly adjacent to the road. To expedite the FAA's safety assessment of the proposed relief sought, Kona Drone Service has included a robust SRM.

The primary contact for this amendment is:

Mr. Ray Anders
Kona Drone Service LLC
75-5503 Mamalahoa Hwy
Holualoa, HI 96725

All other required manuals have already been submitted in support of the Petition contained within FAA-2021-0921.

For the foregoing reasons, Kona Drone Service (KDS) respectfully requests that the FAA grant this amendment without delay. Should you have any questions, or if you need additional information to support Kona Drone Service's position, please do not hesitate to contact the undersigned.

Respectfully Submitted,

Ray Anders CEO
Kona Drone Service LLC

